

EXHIBIT 4

Future Damages Due to Distributors Misconduct From 2019 - 2034 (Based on Errata)

	2018*	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Total Future Damages
Approach 1^[A]																		
Cuyahoga	\$27.3	\$27.9	\$28.6	\$29.4	\$30.1	\$30.9	\$31.6	\$32.3	\$33.1	\$33.8	\$34.6	\$35.4	\$36.3	\$37.2	\$38.1	\$39.0	\$39.9	\$538.3
Summit	\$13.2	\$13.5	\$13.9	\$14.2	\$14.6	\$14.9	\$15.3	\$15.7	\$16.0	\$16.4	\$16.8	\$17.2	\$17.6	\$18.0	\$18.4	\$18.9	\$19.3	\$260.6
Total	\$40.6	\$41.4	\$42.5	\$43.6	\$44.7	\$45.8	\$46.9	\$48.0	\$49.1	\$50.2	\$51.4	\$52.6	\$53.9	\$55.2	\$56.5	\$57.8	\$59.2	\$798.8
Approach 2^[A]																		
Cuyahoga	\$27.8	\$28.4	\$29.1	\$29.9	\$30.6	\$31.4	\$32.1	\$32.9	\$33.6	\$34.4	\$35.2	\$36.0	\$36.9	\$37.8	\$38.7	\$39.6	\$40.6	\$547.0
Summit	\$13.4	\$13.7	\$14.1	\$14.5	\$14.8	\$15.2	\$15.6	\$15.9	\$16.3	\$16.6	\$17.0	\$17.4	\$17.9	\$18.3	\$18.7	\$19.2	\$19.6	\$264.8
Total	\$41.2	\$42.1	\$43.2	\$44.3	\$45.4	\$46.6	\$47.7	\$48.8	\$49.9	\$51.0	\$52.2	\$53.5	\$54.8	\$56.1	\$57.4	\$58.8	\$60.2	\$811.8
Inflation Adjustment^[B]																		
CPI, all items		2.1%	2.6%	2.6%	2.5%	2.5%	2.4%	2.3%	2.3%	2.3%	2.3%	2.4%	2.4%	2.4%	2.4%	2.4%	2.4%	

Notes and Sources:

* McGuire Damages Report, Revised Tables F.4 and F.5 (errata served on September 20, 2019).

[A]: Assumes future damages in 2019 to 2034 are equal to 2018 damages on a real dollar basis. Future damages are shown in nominal dollars by growing 2018 damages by projected CPI inflation.

[B]: CBO, The Budget and Economic Outlook: 2019 to 2029, Table E-1. Assumes constant inflation after 2029.

Projected Cost of Abatement Plan Net of Future Damages

	Total Projected Cost of Abatement Plan: 2020-34 (Base Case) [A]	McGuire's Future Damages Extrapolation: 2020-2034 Total		Future Damages as a % of Total Projected Cost of Abatement Plan		Total Projected Cost of Abatement Plan Net of Future Damages	
		Approach 1 [B]	Approach 2 [C]	Approach 1 [D] = [B] / [A]	Approach 2 [E] = [C] / [A]	Approach 1 [F] = [A] - [B]	Approach 2 [G] = [A] - [C]
[1] Cuyahoga	\$5,012.2	\$510.3	\$518.7	10.2%	10.3%	\$4,501.9	\$4,493.6
[2] Summit	\$2,217.7	\$247.1	\$251.1	11.1%	11.3%	\$1,970.6	\$1,966.6
[3] = [1] + [2]	\$7,229.9	\$757.4	\$769.8	10.5%	10.6%	\$6,472.5	\$6,460.2

Notes and Sources:

[A]: Estimated 15-year cost under base case. See Liebman Report Tables 1 and 2 (errata served on May 16, 2019).

[B], [C]: McGuire Supplemental Table: Future Damages Due to Distributors Misconduct From 2019 - 2034 (Based on Errata). Excludes future damages estimated for 2019.

Offset to the Abatement Plan Due to Future Damages: Cuyahoga County
Offset Estimated by Affected Division

McGuire's Future Damages Extrapolation				Projected Cost of Abatement Plan: 2020-34**	
Affected Division	% of Total*	2020-2034 Damages (\$M)		Abatement Plan Element(s) that Incl. (At Least In Part) the Affected Division's Future Damages	Total Projected Cost (\$M)
		Approach 1	Approach 2		
[1] ADAMHS Board	10%	\$51.8	\$52.7	Treatment (Excl. MAT); MAT	\$3,597.4
[2] DCFS	42%	\$213.8	\$217.3	Special Populations: Child Welfare	\$303.6
[3] Office of Prosecutor	6%	\$31.1	\$31.6	Law Enforcement Interventions	\$74.5
[4] Office of Public Defender	3%	\$15.2	\$15.5	N/A	N/A
[5] Court of Common Pleas	7%	\$33.8	\$34.4	N/A	N/A
[6] Juvenile Court	4%	\$21.6	\$22.0	N/A	N/A
[7] Sheriff's Office	6%	\$30.6	\$31.1	N/A	N/A
[8] County Jail	16%	\$79.8	\$81.1	Special Populations: Jails	\$222.0
[9] Office of Medical Examiner	6%	\$32.5	\$33.1	N/A	N/A
[10] Total Future Damages	100%	\$510.3	\$518.7	[11] Subtotal	\$4,197.6
				[12] Other Abatement Plan Elements	\$814.6
				[13] Total Projected Cost	\$5,012.2
<i>Offset to the Abatement Plan Due to Future Damages:</i>					
[14] = [1] + [2] + [3] + [8]	74%	\$376.55	\$382.69		
<i>Total Projected Cost of Abatement Plan Net of Offset Due to Future Damages:</i>					
[15] = [13] - [14].		\$4,635.66	\$4,629.53		

Notes and Sources:

* Based on affected division's allocation in 2018. See McGuire Appendix IV.C (errata served on September 20, 2019).

** Estimated 15-year cost under base case. See Liebman Report Table 1 (errata served on May 16, 2019).

[1]: Some treatment services will be provided by the ADAMHS Board.

[2]: Some portion of future damages related to staffing and out-of-home placements may be included in the Abatement Plan.

[3]: Some portion of future damages related to staffing may be included in the Abatement Plan.

[4], [6], [7]: Not included in the Abatement Plan.

[5]: Abatement Plan only estimates the cost of additional staffing.

[8]: Some portion of future damages related to staffing may be included in the Abatement Plan.

[9]: Abatement Plan only estimates the cost of additional staffing.

[10]: McGuire Supplemental Table: Future Damages Due to Distributors Misconduct From 2019 - 2034 (Based on Errata). Excludes future damages estimated for 2019.

[11] = $\Sigma[1:9]$.

[12] = [13]-[11].

Offset to the Abatement Plan Due to Future Damages: Summit County
Offset Estimated by Affected Division

McGuire's Future Damages Extrapolation				Projected Cost of Abatement Plan: 2020-34**	
Affected Division	% of Total*	2020-2034 Damages (\$M)		Abatement Plan Element(s) that Incl. (At Least In Part) the Affected Division's Future Damages	Total Projected Cost (\$M)
		Approach 1	Approach 2		
[1] ADM Board	22%	\$53.1	\$54.0	Treatment (Excl. MAT); MAT	\$1,570.6
[2] Children Services Board	56%	\$138.7	\$141.0	Special Populations: Child Welfare	\$227.4
[3] Prosecutor	1%	\$3.2	\$3.2	Law Enforcement Interventions	\$14.6
[4] Court of Common Pleas	3%	\$6.8	\$6.9	N/A	N/A
[5] Juvenile Court	2%	\$5.6	\$5.7	N/A	N/A
[6] Sheriff's Office	4%	\$9.3	\$9.5	N/A	N/A
[7] County Jail	6%	\$13.8	\$14.0	Special Populations: Jails	\$84.0
[8] Alternative Corrections	3%	\$6.6	\$6.7	N/A	N/A
[9] Adult Probation	1%	\$2.2	\$2.3	N/A	N/A
[10] Medical Examiner	3%	\$7.7	\$7.8	N/A	N/A
[11] Total Future Damages	100%	\$247.1	\$251.1	[12] Subtotal	\$1,896.7
				[13] Other Abatement Plan Elements	\$321.0
				[14] Total Projected Cost	\$2,217.7
<i>Offset to the Abatement Plan Due to Future Damages:</i>					
[15] = [1] + [2] + [3] + [7]	85%	\$208.83	\$212.24		
<i>Total Projected Cost of Abatement Plan Net of Offset Due to Future Damages:</i>					
[16] = [14] - [15].		\$2,008.87	\$2,005.47		

Notes and Sources:

* Based on affected division's allocation in 2018. See McGuire Appendix IV.D (errata served on September 20, 2019).

** Estimated 15-year cost under base case. See Liebman Report Table 2 (errata served on May 16, 2019).

[1]: Some treatment services will be provided by the ADM Board.

[2]: Some portion of future damages related to staffing and out-of-home placements may be included in the Abatement Plan.

[3]: Some portion of future damages related to staffing may be included in the Abatement Plan.

[4]: Abatement Plan only estimates the cost of additional staffing.

[5], [6], [8], [9]: Not included in the Abatement Plan.

[7]: Some portion of future damages related to staffing may be included in the Abatement Plan.

[10]: Abatement Plan only estimates the cost of additional staffing.

[11]: McGuire Supplemental Table: Future Damages Due to Distributors Misconduct From 2019 - 2034 (Based on Errata). Excludes future damages estimated for 2019.

[12] = $\Sigma[1:10]$.

[13] = [14]-[12].